

Department of Defense (DoD)
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Digest of Significant Classification Appeal Decisions

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Preface

In this issue of the Civilian Personnel Management Service (CPMS) *Digest of Significant Classification Appeal Decisions*, we present synopses of several noteworthy classification appeal decisions. We have selected cases that we believe illustrate a complex or troublesome classification issue, and we have briefly described the manner in which the issue was resolved. While the intent of the *Digest* is to increase classification consistency within the Department of Defense, *Digest* articles are not intended to restrict the use of classification judgment in situations where the guidance is not applicable. Rather, our articles present what we consider sound classification rationale used in a specific case. That rationale may or may not be appropriate for all similar cases.

The *Digest* is not intended to supersede Office of Personnel Management classification standards. In no case should a *Digest* article be viewed as an alternative to reading and properly discerning the overall intent of standards.

We welcome your comments and suggestions for improving future issues of the *Digest*. Since the articles describe final appeal decisions, we cannot entertain rebuttals. Please send your comments and suggestions to: Civilian Personnel Management Service, Field Advisory Services Division (FAS), Classification Branch, 1400 Key Boulevard, Suite B-200, Arlington, VA 22209-5144. Should you have any questions, please call us at (703) 696-6301, Team 2, or DSN 426-6301, Team 2. Our e-mail address is class@cpms.osd.mil. This digest is also accessible through our web page, <http://www.cpms.osd.mil/fas/class&pay.htm>.

Case Number	1
Standard(s)	OPM Logistics Management Series, GS-346 (January 1987)
Factor	N/A
Issue	Series coverage
Other References	OPM Support Services Administration Series, GS-342 (November 1978)

Identification of the Classification Issue

The appellant served as Chief of Logistics in a district office of a major Army command. According to the

position description of record, this responsibility involved planning and overseeing the execution of the supply management, materiel maintenance management, facilities/space management, and transportation functions to meet logistics support requirements for the district's mission. The servicing personnel office had classified the appellant's position in the Logistics Management Series, GS-346, and the appellant did not challenge this determination. However, in reviewing the actual duties and responsibilities of the position, CPMS questioned whether the appealed position fully met the intent of the GS-346 series.

Resolution

The GS-346 series covers positions that involve planning, coordinating, or evaluating the logistical actions required to support a specified mission or designated program. The work involves: (1) identifying the specific requirements for money, manpower, materiel, facilities, and services needed to support the program and (2) correlating those requirements with program plans to assure that the needed support is provided at the right time and place.

Specifically excluded from the GS-346 series are positions that primarily involve supervising, directing, planning, and coordinating a variety of service functions that are principally work supporting. Rather, work that involves providing support for organizations and employees *primarily* in an administrative or office environment is covered by the Support Services Administration Series, GS-342.

The CPMS factfinding process revealed that the appellant's work involved some mission-supporting aspects, such as the procurement, storage, and shipment of some emergency response items and the procurement, maintenance, and disposal of some specialized engineering equipment. However, this type of work comprised no more than 10 percent of the overall workload of the organization under the appellant's direction. The preponderance of the work involved providing support to accomplish the administrative aspects of field office operations. Responsibility for assessing and planning for logistical needs of the various field office projects resided in the respective project offices or branches. While the appellant's organization advised on appropriate aspects (e.g., supply, storage, and maintenance sources) and carried out specific support functions, the actual planning and evaluation of the logistical aspects of mission operations were performed by other organizations.

In summary, CPMS concluded that because the appellant's position involved management and supervision of functions that provided support primarily for accomplishment of administrative aspects of district office operations, the position was excluded from coverage of the GS-346 series. The work that involved atypical categories of administrative or office support was found not to represent significantly different qualifications requirements. Therefore, the position was allocated to the Support Services Administration Series, GS-342.

<u>Case Number</u>	2
Standard	OPM General Schedule Supervisory Guide (April 1993)
Factor	Factor 2, Organizational Setting
Issue	Determining Senior Executive Service (SES) equivalency
Other References	N/A

Identification of the Classification Issue

This case involved a position that served as a full deputy to a military chief of a supply organization at a

typical Air Force base. The chief reported to a Group Commander at the rank of colonel. The Group Commander reported to the Wing Commander, which was also a colonel position. The Wing Commander reported to a four-star general at the major command level of the agency. Factor 2 was evaluated at Level 2-2 (250 points) by equating the Wing Commander position to the SES level, despite the fact that the position was designated as a colonel position.

Resolution

The General Schedule Supervisory Guide (GSSG) specifically identifies those military officer positions that are considered SES equivalents: (1) military officers at, equivalent to, or above the ranks of Rear Admiral and Brigadier General and (2) commanding officers of the very largest military installations, regardless of rank. While the servicing personnel office identified the Wing Commander as an SES equivalent, CPMS found no evidence to corroborate this. An organization chart submitted separately from the appeal indicated that the Wing Commander position had been equated to an SES position by crediting three subordinate Group Commanders as GS-15 supervisors. However, no civilian versions of the military position descriptions had been developed and evaluated to substantiate these determinations. Furthermore, the intent of the GSSG is that positions credited as subordinate GS-15 supervisors must be responsible for directing mission-oriented work for which the SES equivalent is responsible. In the instant case, only one of the subordinate managers met this criterion, and that position was evaluated below the GS-15 level. Accordingly, CPMS found that the Wing Commander could not be credited as an SES equivalent by equating subordinate managers to the GS-15 level.

Since the Wing Commander met none of the criteria in the GSSG for crediting as an SES equivalent, CPMS found that the position under evaluation reported to a position that was two or more levels below the first general officer. Therefore, Level 2-1 (100 points) was assigned.

Case Number	3
Standard	OPM General Schedule Supervisory Guide (April 1993)
Factor	Factor 2, Organizational Setting
Issue	Identification of "deputy" positions
Other References	<i>OPM Digest of Significant Classification Decisions and Opinions, Number 19, page 8</i>

Identification of the Classification Issue

The appealed position was that of a Division Chief in a directorate of a large Army installation. The Garrison Commander was a military officer that had been determined to be equivalent to the Senior Executive Service (SES) level. Reporting to the Commander was a Director of Logistics (DOL) whose position was below the SES (or equivalent) level. The appellant reported to a Logistics Management Officer (LMO) next below the DOL. While the servicing personnel office credited the LMO as a "deputy" for the purpose of evaluating Factor 2, CPMS questioned the validity of this determination.

Resolution

The deputy concept used in the General Schedule Supervisory Guide (GSSG) is intended to apply to a limited number of positions that fit one of two very specific situations:

(1) The position is designated as a full assistant to the chief of the organization and shares in the management of the entire organization. In this situation, the deputy is delegated the same managerial decisionmaking authority as that vested in the chief position.

(2) The chief and the deputy have responsibility for management of an equal (or nearly equal) portion of the total organization.

CPMS found that while the LMO performed some duties as a "deputy" to the DOL, the LMO was not a full "deputy" as defined in the GSSG. The LMO spent the majority of his time (80 percent) directing the work of subordinate units and planning and managing the resources of the directorate. The duties performed in the capacity of "deputy" consumed no more than 20 percent of the LMO's time and were performed *as required*, rather than on a continuing basis. The LMO position did not fit either of the two "deputy" situations described above in that the incumbent did not share fully in the management of the Directorate; nor was the responsibility for management of the Directorate divided equally between the LMO and the DOL. Therefore, CPMS concluded that the LMO could not be considered a "deputy" for the purpose of evaluating Factor 2.

CPMS found that the appellant reported to a position two levels below the first SES equivalent. Thus, Level 2-1 and 100 points were assigned.

Case Number	4
Standard	OPM Contracting Series, GS-1102 (December 1983)
Factor	Factor 2, Supervisory Controls
Issue	Distinguishing between Level 2-4 and Level 2-5
Other References	<i>OPM Digest of Significant Classification Decisions and Opinions, Number 7, Page 5</i>

Identification of the Classification Issue

The appellant served as Corporate Administrative Contracting Officer (CACO) for a major Defense contractor. As CACO, the appellant was responsible for serving as the single focal point for corporation-wide contract administration matters related to all Government contracts executed by divisions and subsidiaries under the control of the corporation. The position description of record indicated that the appellant received only administrative supervision from the Contracts Officer and the Deputy Contracts Officer. The position description further stated that the results of the appellant's work were considered technically authoritative and were normally accepted without change. The servicing personnel office proposed upgrading the position by crediting Level 2-5. When the major command did not support the local proposal to upgrade the position, the incumbent appealed to CPMS.

Resolution

Factor 2, Supervisory Controls has three components: how the work is assigned, the employee's responsibility for carrying out the work; and how the work is reviewed. To credit a particular factor level, the full intent of that level must be met. CPMS analyzed each element of Factor 2 as follows.

Assignment of Work

The CPMS factfinding revealed that the appellant did, in fact, function with a high level of technical independence. However, the Deputy Contracts Officer regularly engaged in discussions with the appellant on strategies for accomplishing the work and participated in the development of deadlines for its completion. CPMS found that this situation matched Level 2-4.

The Employee's Responsibility

The appellant's responsibility for carrying out his work also equated to Level 2-4. Within the context of broad program goals and objectives, he independently identified more specific goals and plans for carrying out the work. Corresponding to Level 2-4, the appellant independently coordinated with professional experts, such as attorneys, accountants, auditors, and insurance experts who advised him in developing the Government's position or participated in negotiations with corporate management officials. Consistent with Level 2-4, the appellant independently resolved most of the technical issues encountered, and independently negotiated with corporate management officials. He did, however, keep his supervisor apprised of unusual or unprecedented situations that had the potential to impact on policy.

Review of Completed Work

The appellant's completed work products included formal agreements with the contractor, correspondence, and memoranda of agreement. The supervisor did not make a detailed review of the technical content of the work, but all outgoing correspondence was reviewed to determine whether it conformed to "good business judgment" and was compatible with overall agency policy. This component of Factor 2 was also found to be consistent with Level 2-4.

CPMS found that Level 2-5 was not appropriate for the appellant's position. It is not merely the delegation of a high level of technical independence that characterizes this level, but also a corresponding **program management responsibility** that requires the employee to independently determine, plan, and carry out all activities related to a broad program or function. Within the context of the GS-1102 occupation, such an assignment might involve independently planning, developing, and carrying out all activities related to a significant acquisition program that requires work associated with a range of contracting specializations. The appellant's responsibility for serving as a CACO for a major contractor did not entail the level of program management responsibility envisioned by Level 2-5. He did not independently manage a broad program, and his work received a definable level of technical review. Consequently, CPMS credited Level 2-4, as the full intent of Level 2-5 was not met.

Case Number	5
Standard	OPM Boiler Plant Operator, WG-5402 (March 1991)
Factor	Skill and Knowledge
Issue	Intent of WG-10 level
Other References	OPM <i>Digest of Significant Classification Decisions and Opinions</i>, Number 13, Page 10

Identification of the Classification Issue

The appellant's position was classified as Boiler Plant Equipment Mechanic, but 25 percent of the appellant's time was spent performing boiler plant operator duties, which the servicing personnel office had classified at

the WG-10 level. The appellant maintained that he operated high-pressure boilers and auxiliary equipment on all three shifts, holidays, and weekends. He also claimed that he performed the same duties performed by a WG-11 operator when substituting for the incumbent of that position. Thus, the appellant claimed that his position should be classified as Boiler Plant Operator, WG-5402-11.

Resolution

The CPMS factfinding revealed that the appellant's work required skill in operating single and multi-fueled power steam boilers and auxiliary equipment, to include making proper adjustments, maintaining proper water level, and taking operational recordings (e.g., steam flow, steam pressure, water pressure, and flue gas temperature). The appellant also used a knowledge of boiler plant maintenance techniques in order to perform "on-the-spot" adjustments and repairs and to plan and accomplish scheduled maintenance and repairs. The predominant fuel used was natural gas; occasionally Number two (#2) fuel oil was used as a backup fuel. Recycled oil was also burned in one of the boilers; however, it was reclaimed to the same specifications as #2 fuel oil and had been burned for only a few days over the past year. Natural gas and #2 fuel oil are both clean-burning fuels that do not require constant attention in order to maintain efficient combustion or to control the formulation of pollutants.

CPMS found that the appellant was required to use skill and knowledge that exceeded the WG-8 level. At this level, boiler plant workers normally use working knowledge of the structure and operating characteristics of power boilers and associated auxiliary equipment to assist higher graded workers in the operation and operational maintenance of high-pressure, single and multi-fueled power boilers. In contrast, the appellant utilized a knowledge of boilers and auxiliary equipment to independently operate and maintain power boilers and associated auxiliary equipment.

CPMS found that the level of skill and knowledge required by the appellant did not fully meet the WG-10 level. A WG-10 Boiler Plant Operator applies a comprehensive knowledge of all operational phases of power boiler plant operations to start, operate, adjust, stop, maintain, and perform various operational repairs on single or multiple fuel power boilers and associated auxiliary and pollution control equipment. A WG-10 operator also applies a thorough knowledge of the structural and operating characteristics of power boilers that are fired by coal, oil, refuse derived fuel (RDF), wood, or a combination of these fuels to produce steam or high temperature hot water. This level of knowledge is required to maintain efficient combustion levels and to control the formulation of pollutants. A WG-10 operator must apply a thorough knowledge of boiler plant auxiliary and pollution control equipment to ensure compliance with air pollution laws and regulations. The appellant was required to apply skill and knowledge needed to operate boilers that use clean-burning fuels, rather than fuels that require the constant attention of the operator. Consequently, the appellant was not required to apply a knowledge of how to operate and maintain auxiliary pollution control equipment. In short, CPMS found that the skill and knowledge used by the appellant exceeded the WG-8 level, but did not fully meet the WG-10 level. Therefore, CPMS evaluated Skill and Knowledge at the WG-9 level.

Case Number	6
Standard	OPM General Schedule Supervisory Guide (April 1993)
Factor	Factor 3, Supervisory and Managerial Authority Exercised
Issue	Crediting Level 3-3
Other References	<i>OPM Digest of Significant Classification Decisions and Opinions, Number 19, page 10</i>

Identification of the Classification Issue

The appellant served as a staff training officer for a large Army Reserve Command. The appellant's duties included assessing the training status of subordinate headquarters, establishing training plans and programs for the command, and approving training plans and programs of subordinate headquarters. The appellant also exercised responsibility for consolidating the command training budget, justifying the budget, and monitoring the execution of the budget throughout the command. In addition, the appellant exercised direct supervision over a full-time staff of military employees. The servicing personnel office credited Level 3-3 for Factor 3, based on the appellant's delegated authority to manage the command's training program. However, CPMS questioned whether the full intent of Level 3-3 was met.

Resolution

The General Schedule Supervisory Guide (GSSG) describes two situations for Level 3-3, either of which can be credited for this level. Level 3-3a describes a high level of managerial authority exercised over subordinate units and employees, and Level 3-3b describes supervisory authorities exercised on a regular basis, when those authorities surpass those described at Level 3-2c.

Level 3-3a is appropriate for a position that has delegated managerial authority to unilaterally **set** a series of annual or similar types of long-range work plans and schedules for the work supervised. CPMS factfinding revealed that the appellant **recommended** training plans and programs for the command, but did not have the authority to independently determine long-range work plans. CPMS concluded that this level of program planning responsibility was not fully commensurate with Level 3-3a. Further, CPMS found that while the appellant participated with program officials within the command in the development of goals and objectives for his program, he did not participate with high-level (i.e., agency-level) officials in the development of the overall goals and objectives for the agency training program. Consequently, the appellant was not required to direct complex activities such as development of data, provision of expertise and insight, securing of legal opinions, and preparation of position papers, as required to support high levels of program management and development. In short, the appellant's managerial duties were not fully equivalent to Level 3-3a.

Further factfinding revealed that the appellant's position also failed to fully meet the intent of Level 3-3b. While the appellant claimed credit for eight of the supervisory authorities described in the standard, CPMS factfinding revealed that only six of the authorities were actually exercised on a recurring basis. Paragraph 9 of Level 3-3b could not be credited because the appellant was not actually delegated the authority to **resolve** serious employee complaints; his supervisor retained this authority. Paragraph 10 was not credited because the appellant did not have the authority to **approve** serious disciplinary actions involving his staff of military employees. Therefore, CPMS credited Level 3-2c, the highest level that was fully met.

<u>Case Number</u>	7
Standard	OPM Equal Employment Opportunity Series, GS-260 (dated November 1980)
Factor	Factor 1, Knowledge Required by the Position
Issue	Distinguishing between Level 1-7 and Level 1-8
Other References	<i>OPM Digest of Significant Classification Decisions and Opinions, Number 3, page 6</i>

Identification of the Classification Issue

The appellant served as the equal employment manager for a regional office of the Defense Commissary Agency, exercising responsibility for administering a fully developed equal employment opportunity program that included affirmative employment programs as well as a full range of special emphasis programs. The appellant served as the subject matter expert and primary advisor to top management of the region on equal employment matters. The program served a workforce of approximately 3,000 civilian employees dispersed over 11 States at 38 different commissaries and activities.

The servicing personnel office credited Level 1-7 for Factor 1, Knowledge Required by the Position, but the appellant argued that Level 1-8 should have been credited. Her argument was based largely on her claim that she was regularly required to identify and resolve **systemic** problems by conducting on-site organization reviews, monitoring complaints, and conducting regular and systemic workforce analyses.

Resolution

In addition to processing complaints and providing advice on legal and procedural program requirements, the appellant's responsibilities included identifying systemic barriers to equal employment opportunity (EEO), such as management practices, organizational structure, employment patterns, and lines of progression. However, CPMS found that approximately 60 percent of the appellant's time was devoted to complaint processing, a very strong indication of the case-oriented focus of the program. Further, CPMS found that the systemic issues encountered did not require the **depth of involvement** typical of Level 1-8, where efforts are focused on eliminating major barriers to EEO, such as established agency management policies and practices. The CPMS factfinding also revealed that the appellant's involvement in identifying and solving systemic problems did not require her to become **deeply** involved in technical personnel administration or management issues by participating in agency management audits, personnel management evaluations, and similar efforts.

In summary, CPMS found that the mere presence of systemic problems was not sufficient to justify crediting Level 1-8. Rather, it is the depth and complexity of the activities undertaken to resolve such problems which distinguishes Level 1-8 from Level 1-7. Because the appellant did not regularly engage in the kind of activities that require knowledge comparable to Level 1-8, CPMS evaluated Factor 1 at Level 1-7.

<u>Case Number</u>	8
<u>Standard</u>	OPM Heavy Mobile Equipment Mechanic, WG-5803(dated January 1991) and FWS Inspector (dated April 1982)
<u>Factor</u>	N/A
<u>Issue</u>	Series determination
<u>Other References</u>	None

Identification of the Classification Issue

The servicing personnel office had classified the appealed position in the WG-5801 series, a general series covering jobs with characteristics of the WG-5800 Transportation/Mobile Equipment Maintenance Family. This job family includes occupations involved in repairing, adjusting, and maintaining self-propelled transportation and other mobile equipment (except aircraft), including any special purpose features with which they may be equipped. The appellant requested that his position be classified as a Heavy Mobile

Equipment Inspector in the WG-5803 series.

Resolution

CPMS factfinding revealed that the appellant used a dynamometer (an automated high-speed computer system) to test engines, transmissions, and transfer cases of heavy duty and automotive equipment and vehicles. As malfunctions or failures were identified, the appellant corrected problems by adjusting, repairing, or replacing such components as water and fuel pumps, turbo chargers, injector pumps, exhaust manifolds, injectors, starters, blowers, rocker assemblies, valve bodies, steer bodies, shift solenoids, gaskets, seals, covers, etc. After replacing or repairing the components, the appellant conducted further tests to verify their serviceability or nonserviceability. If the test data showed that the items needed to be rejected and sent back to the shop, the appellant printed the test results and relayed pertinent facts and information to the mechanic.

CPMS found that the appellant's position was not covered by the Inspector standard. Positions properly classified as "Inspector" involve the examination of services, materials, and products that are processed, manufactured, or repaired by workers performing trades or craft work to determine that the physical and operating characteristics are within acceptable standards, specifications, or contractual requirements. Inspectors are required to perform neither major nor minor repair work. Therefore, CPMS concluded that the predominant work of the appellant's position, i.e., testing and repair of automotive and heavy duty equipment, did not match the definition of inspector work.

In comparing the appellant's work to the WG-5803 series definition, CPMS found that this series did not adequately cover the complete scope of the appellant's work. While a significant amount of time was spent testing and repairing heavy duty equipment covered by this series, the appellant also performed repair work covered by the Automotive Mechanic Series, WG-5823, with neither kind of work predominating. Because the appellant's work was clearly characteristic of the WG-5800 Transportation/Mobile Equipment Maintenance Family, but could not be identified with any one specific occupation within the family, CPMS classified the position in the WG-5801 series.

Case Number	9
Standard	Job Grading Standard for Leader, WL/NL
Factor	N/A
Issue	Pay Plan Determination
Other References	<i>OPM's Introduction to the Position Classification Standards, Section IV.A</i>

Identification of the Classification Issue

In this group appeal, the appellants' positions were classified in the Federal Wage System (FWS) as Training Leaders, WL. The appellants requested classification under the General Schedule as GS-1712 Training Instructors, with the title reflecting the appropriate trade knowledge requirement, e.g., Pipefitter Training Instructor, Marine Machinery Training Instructor, etc. The appellants argued that their positions should be classified under the General Schedule because of the amount of course development work they performed, the amount of trades related training they conducted that was not specific to a particular trade, and the amount of general training they conducted that was not trades related. The appellants claimed that teaching knowledge and skills were the most important qualification requirement of their position and thus supported classification under the General Schedule.

Resolution

Section 5102 of Title 5, United States Code exempts from coverage under the General Schedule (GS) those employees in recognized trades or crafts and other employees in positions having trade, craft, or laboring experience and knowledge as the paramount requirement. The "paramount requirement" of a position refers to the essential, prerequisite knowledge, skills, and abilities needed to perform the primary duty or responsibility for which the position has been established.

CPMS factfinding revealed that the appellants' work required a mixture of different kinds of knowledge and experience, since not all of the classes taught were related to specific trades. In addition to the trades training, the appellants were required to develop and teach classes on such topics as telephone security, sexual harassment, and ethics and standards of conducts. The classes provided administrative skills or knowledge used by both FWS and GS employees.

In situations where the work consists of mixed duties, it may be necessary to evaluate such factors as the nature of work products or services of the organization, working relationships with other positions in the organization, recruitment sources for the position, normal lines of career progression, equitable pay relationships with other positions in the immediate organization, and management's intent in creating the position. If the weight of these factors points toward trade knowledge and experience as being of primary importance, the position is properly classified under the Federal Wage System.

Information provided by the appellants and their supervisors established that management's **primary** objective in creating the positions was to teach trades skills, including complete trades training programs for journey level mechanics and apprentices. This work required the appellants to possess journey level knowledge in their trade as well as a broad range of trades knowledge. Therefore, CPMS found that the paramount requirement of the appellants' positions was trades knowledge, and thus concluded that the positions were properly classified under the Federal Wage System.

The Job Grading Standard for Leader positions indicates that positions with a paramount requirement of full knowledge and experience at the target level for which students are being trained are covered by that standard when a practical knowledge of the methods and techniques of instruction is the **second most important** requirement. The standard also covers positions that require, as the most important requirement, trade knowledge of sufficient depth and range in a trade to improve the skills of others being trained in that trade, when a practical knowledge of the methods and techniques of instruction is the next most important requirement. Therefore, the appellants' positions were found to be properly classified as wage leaders.

Case Number	10
Standard	OPM General Schedule Supervisory Guide (April 1993)
Factor	Factor 1, Program Scope and Effect
Issue	Interpretation of "complex, multimission installation" for crediting Scope at Level 1-3
Other References	<i>OPM Digest of Significant Classification Decisions and Opinions</i>, Number 19, page 5; DoD Supplementary Guidance on the General Schedule Supervisory Guide (dated June 1993)

Identification of the Classification Issue

The appellant served as a division chief in the Directorate of Civilian Personnel, with responsibility for providing labor relations, management-employee relations, and incentive awards services for an Army installation and its tenants. The appellant supervised a small staff providing supporting personnel services to a civilian population totaling about 1,500 employees. In its evaluation of Factor 1, the servicing personnel office credited Level 1-3 for Scope, based on its determination that the appellant was responsible for providing complex administrative services directly supporting a "complex, multimission installation." However, CPMS questioned the accuracy of this determination.

Resolution

A complex, multimission installation, as defined in the General Schedule Supervisory Guide (GSSG), is one that includes four or more of the following: (1) a garrison; (2) a medical center or large hospital and medical laboratory complex; (3) multimillion dollar (annual) construction, civil works, or environmental cleanup projects; (4) a test and evaluation center or research laboratory of moderate size; (5) an equipment or product development center; (6) a service school; (7) a major command higher than that in which the servicing position is located or a comparable tenant activity of moderate size; (8) a supply or maintenance depot; or (9) equivalent activities. These activities are individually smaller than a large installation with more than 4,000 employees.

In equating an organization to a complex, multimission installation, the GSSG permits crediting activities other than those listed in the above definition, provided the activities credited are fully equivalent in complexity. The servicing personnel office credited the installation with four of the activities listed: a garrison, a large hospital with a medical laboratory complex, a service school, and multimillion dollar (annual) construction and environmental cleanup projects. However, CPMS questioned whether the installation's service school and multimillion dollar projects met the intent of the GSSG definition.

Because the GSSG does not define the term "service school," CPMS relied on the examples listed in the DoD supplementary guidance: U.S. Army War College, West Point, Air Force Academy, Industrial College of the Armed Forces, Navy Post Graduate School, Industrial College of the Armed Forces, and the U.S. Coast Guard Academy. The service school credited by the servicing personnel office was a branch school, which is generally understood to be an echelon below the examples of multidisciplinary schools listed in the DoD guidance. Thus, CPMS did not find it to be equivalent. Moreover, CPMS concluded that because the appellant's services directly affected only the relatively small civilian population of the school (175 employees), rather than its entire military and civilian population, this organization could not be credited as equivalent to a service school.

With respect to multimillion dollar (annual) construction and environmental cleanup projects, CPMS found that only one \$8 million construction project was underway, and its anticipated duration was two to three years. Thus, the annual cost of the project was considerably less than \$8 million. Likewise, only one environmental cleanup project was being carried out, and its cost was only \$1.2 million, rather than several million dollars. Therefore, CPMS determined that multimillion dollar projects were not an ongoing mission of the installation.

Because only two of the four activities were creditable, CPMS concluded that the appellant did not provide services to an organization comparable to a complex, multimission installation. Likewise, because the total serviced population was well below 4,000, the installation could not be credited as a "large" military installation. Therefore, CPMS determined that Scope was not correctly evaluated at Level 1-3. Instead, Level

1-2 (350 points) was assigned. This level is appropriate for positions that provide administrative services to a small or medium military installation or comparable activities of an agency.

Case Number	11
Standard	General Schedule Supervisory Guide (April 1993)
Factor	Factor 5, Difficulty of Technical Work Directed
Issue	Converting Federal Wage System work to a General Schedule grade
Other References	None

Identification of the Classification Issue

The appellant served as a full deputy to a military chief of a supply organization at an Air Force base. The organization was composed of a large workforce of approximately 235 positions, a significant number of which were Federal Wage System (FWS) positions. The highest level of FWS work was performed by Fuel Distribution System Operators, WG-5413-10. This work involved initiating and controlling the storage, movement, and transfer of fuel supplies by operating high-pressure systems with a series of multifuel storage and distribution facilities connected by a network of internal pipelines. The operator used radio and telephone communications, a central control board, and other dispatching facilities to store, move, and transfer fuel through the extensive pipeline and tank farm systems. In addition, the operator performed routine maintenance of fuel distribution systems and recorded gauge readings received at regular intervals from transfer and receiving points. CPMS determined that this work should be converted to a General Schedule (GS) grade for consideration in arriving at the level of work creditable under Factor 5.

Resolution

While it is not possible to make a direct correlation between FWS and GS work, some valid analogies can be made to convert FWS work to a GS grade. Because FWS jobs are graded by using a different set of grade-determination factors, a suitable GS classification standard must be selected to properly credit the skill and knowledge, responsibility, working conditions, and physical ability required by the FWS work. The standard selected may be a narrative standard or a Factor Evaluation System (FES) standard, so long as it permits measurement of the important grade-determining characteristics of the FWS work.

In the instant appeal, CPMS selected the Office of Personnel Management standards for the Telecommunications Processing Series, GS-390 (dated November 1991) and the Computer Operations Series, GS-332 (dated January 1984). Work in the GS-390 series involves operating equipment in transmitting, receiving, and relaying messages. The work requires knowledge of message handling procedures and use of computer hardware and software or other equipment to send messages to their proper destination. The work is performed in major relay centers, in intermediate relay centers linked to major relay centers, and in telecommunications centers serving an installation or base and satellite subscribers. Work in the GS-332 series involves operating the controls of the digital computer system and peripheral equipment when the equipment is used in direct support of computer operations and the equipment is operated to acquire knowledge and skills needed in operating the control console of a computer system. CPMS reasoned that the work of the WG-10 Fuel Distribution System Operators who operated equipment to store, move, and transfer fuel was more analogous to operating equipment to send messages to their proper destination and thus relied more heavily on the criteria in the GS-390 standard.

Both the GS-390 standard and the GS-332 standard are written in the FES format. In comparing the work of

the WG-10 Fuel Distribution System Operators to the GS-390 standard, CPMS considered each of the nine grade-determining factors. However, of paramount importance were Factors 1, 2, 8, and 9, because these factors correspond directly to the grade determining factors used to evaluate FWS jobs. CPMS addressed these factors as follows.

Factor 1, Knowledge Required

CPMS reasoned that the knowledge used by the WG-10 Fuel Distribution System Operators was comparable to the knowledge required at Level 1-5 to operate computers to maintain the flow of messages through a computerized telecommunications relay system, find alternative solutions when common solutions fail, and use nonstandard controls when standardized operator controls and procedures do not isolate and solve problems. Similar to Level 1-5, the WG-10 employees were required to use telephone and radio dispatching, a central control board, and other dispatching facilities, to store, move, and transfer fuel supplies. Similar to the knowledge at Level 1-5 used to solve unusual and difficult operating problems by applying diagnostic or troubleshooting techniques, the WG-10 operators were required to determine if facilities were functioning properly, to stop the transfer of fuel if discrepancies appeared, and to order an investigation and correction of trouble. Also, similar to the requirement at Level 1-5 to extract statistical data from the system for reports, the WG-10 Fuel Distribution System Operators were required to keep records of gauge and scale readings and volumes of fuel transferred.

Because Level 1-5 was the highest level described in the GS-390 standard, CPMS referred to the GS-332 Computer Operation standard to determine if Level 1-6 could be credited. However, CPMS concluded that the WG-10 Fuel Distribution System Operators' work did not require a level of knowledge that corresponded to that at Level 1-6 needed to assist in planning, developing, and implementing new or revised operating methods, procedures, and techniques. Accordingly, CPMS concluded that Level 1-5 (750 points) was the highest level creditable under Factor 5.

Factor 2, Supervisory Controls

CPMS found that Level 2-3 (275 points) was highly descriptive of the kind of supervision exercised over the work of the WG-10 Fuel Distribution System Operators. At this level, work is performed from general instructions that cover anticipated problems. The employee identifies problems, makes decisions under pressure to restore system operation promptly, and takes corrective action. Completed work is reviewed for adequacy of technical decisions and timeliness of actions.

Factor 8, Physical Demands

The WG-10 Fuel Distribution System Operators' work required some standing, bending, and working on ladders. Also, they were required to lift objects weighing up to 50 pounds, and occasionally heavier objects. CPMS found that these physical demands exceeded Level 8-1, the highest level described in the GS-390 standard. By consulting the GS-332 standard, CPMS found that Level 8-2 (20 points) was creditable. This level is appropriate for work that involves some physical exertion, such as long periods of standing; recurring bending, crouching, stooping, stretching, reaching, or similar activities; or recurring lifting of moderately heavy items weighing as much as 45-50 pounds.

Factor 9, Work Environment

The WG-10 Fuel Distribution System Operators performed much of their work outdoors in inclement weather. They were also subject to danger from petroleum product fumes when working in close areas.

CPMS found that this situation exceeded Level 9-1 and credited 9-2 (20 points). According to the GS-332 standard, this level is appropriate for positions that require working around equipment with exposed moving parts or machines; or exposure to irritant chemicals.

In evaluating the remaining factors, CPMS awarded the following factor levels and points:

Factor 3, Guidelines--Level 3-3 (275 points)

Factor 4, Complexity--Level 4-2 (75 points)

Factor 5, Scope and Effect--Level 5-2 (75 points)

Factor 6, Personal Contacts and Factor 7, Purpose of Contacts--Level 2b (75 points)

A total of 1565 points were assigned for the work performed by the WG-10 Fuel Distribution System Operators. Using the FES Grade Conversion Table in the GS-390 standard, this total falls within the range (1355-1600) for GS-7 positions. Accordingly, CPMS concluded that the work of the WG-10 Fuel Distribution System Operators should be converted to a GS-7 grade.